

**UNITED STATES DISTRICT COURT  
OF THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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**MARJORIE TAYLOR GREENE**, an individual,

*Plaintiff,*

v.

**MR. BRAD RAFFENSPERGER**, in his official capacity as Georgia Secretary of State, **MR. CHARLES R. BEAUDROT**, in his official capacity as an Administrative Law Judge for the Office of State Administrative Hearings for the State of Georgia, **JOHN DOE 1**, in his official capacity, and **GOVERNMENT ENTITY 1**,  
*Defendants.*

**Civ. No. 1:22 Civ. 1294-AT**

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**MOTION TO WITHDRAW AS LOCAL COUNSEL**

**COME NOW** The Hilbert Law Firm, LLC, Kurt R. Hilbert, Esq. and Christopher Gardner, Esq., and respectfully files this Motion and Notice to Withdraw as Counsel pursuant to Local Rule 83.1 et seq.

1. Attorneys Kurt R. Hilbert and Christopher Gardner of The Hilbert Law Firm, LLC have appeared and currently serve only as local counsel for Plaintiff Marjorie Taylor Greene in the above captioned lawsuit.

2. Messrs. Hilbert and Gardner and The Hilbert Law Firm, LLC hereby move to withdraw as counsel for Greene and give notice of same. Local Rule 83.1.
3. Mr. James Bopp of The Bopp Law Firm, LLC is lead counsel in this matter and David Guldenschuh, Esq., as now substituted local counsel, have assumed all responsibilities incumbent about Plaintiff Greene's counsel in this matter. *Id.*
4. Plaintiff Greene has no longer engaged The Hilbert Law Firm, LLC as local counsel and has consented to this withdrawal.
5. Greene has been advised of the following:
  - That the Court retains jurisdiction over this matter,
  - That Greene is adequately represented by lead counsel and substituted counsel,
  - That she is required, through her lead counsel and substitute counsel, to keep the Court informed of a location where notices, pleadings, or other papers may be served,
  - That she is required, through lead counsel and substitute counsel, to prepare for trial, if necessary,
  - That failure or refusal to satisfy court-related obligations could result in adverse consequences,

- The dates of any scheduled proceedings, if any, that no deadlines or proceedings will be affected by withdrawal of counsel; and
- This notice has been be served to lead counsel and substitute local counsel.

LR 83.1(E)(3); LR 83.1(E)(2)(b).

6. Plaintiff Marjorie Taylor Greene has signed this Motion to Withdraw below showing her consent to the withdrawal. LR 83.1(E)(3)
7. The withdrawal of Messrs. Hilbert and Gardner will not affect the progress of this case nor delay same as Greene is continued to be represented by James Bopp, as lead counsel, and David Guldenschuh, as substituted local counsel.
8. Accordingly, Messrs. Hilbert and Gardner and The Hilbert Law Firm, LLC hereby respectfully request to withdraw as legal counsel for Plaintiff in the above captioned matter in all respects. LR 83.1(E)(3).

Dated: April 29, 2022

/s/ Kurt R. Hilbert

Kurt R. Hilbert

Georgia Bar No. 352877

/s/ Christopher Gardner

Georgia Bar No. 163932

THE HILBERT LAW FIRM, LLC

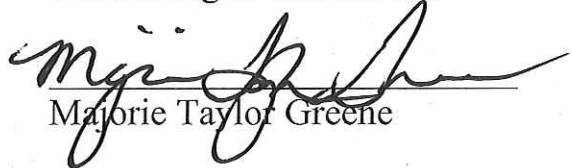
205 Norcross Street

Roswell, GA 30075

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Consenting to withdrawal:

  
Marjorie Taylor Greene

[khilbert@hilbertlaw.com](mailto:khilbert@hilbertlaw.com)  
[cgardner@hilbertlaw.com](mailto:cgardner@hilbertlaw.com)

### **CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing has been formatted using Times New Roman font in 14-point type in compliance with Local Rule 7.1(D).

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing **MOTION TO WITHDRAW AS LOCAL COUNSEL** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the parties of record via electronic notification.

Dated: April 29, 2022.

**THE HILBERT LAW FIRM, LLC**

/s/ Kurt R. Hilbert (e-sig)  
Kurt R. Hilbert